

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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Chapter 11

In re:

Case No. 23-10905 (PB)

GLOBAL FERTILITY & GENETICS
NEW YORK, LLC,

Debtor.

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**APPELLANT ANNIE LIU’S STATEMENT OF ISSUES ON APPEAL AND
DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Annie Liu (“**Ms. Liu**”) by her attorneys, Spence Law Office, P.C., respectfully submits this statement of issues on appeal and designation of items to be included in the record on appeal pursuant to Rule 8009(a)(1) of the Federal Rules of Bankruptcy Procedure (“**Bankruptcy Rules**”) and Local Rule 8009-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York (“**Local Bankruptcy Rules**”), in connection with her September 22, 2024 Notice of Appeal (“**Appeal**”) filed from the September 17, 2024 *Findings of Fact, Conclusions of Law, and Order Confirming Dr. Hu’s Third Amended Chapter 11 Plan of Reorganization and Granting Related Relief* [Docket No. 197], entered by the United States Bankruptcy Court for the Southern District of New York which references the *Court’s Memorandum Decision Confirming Dr. Hu Bo’s Chapter 11 Plan of Reorganization*, dated September 7, 2024 [Docket No. 192] (collectively, the “**Bankruptcy Order**”).

As and for her Statement of Issues, Ms. Liu states as follows:

ISSUES ON APPEAL

1. Did the Bankruptcy Court err in finding and concluding that the Plan proponent satisfied its burden of proof that all of the applicable provisions under 11 U.S.C. §1129 were

satisfied, particularly when, among other things, the Plan proponent failed to prove (a) that the Plan was feasible, (b) that the Plan was fair and equitable, and (c) that equity had no value?

2. Did the bankruptcy court err in concluding that the Plan proponent satisfied its burden of proof under 1129(b)(2)(C) with respect to the objecting class of equity holders by, among other things, applying an inappropriate method of valuing the debtor's equity under a Plan that proposed to pay creditors in full without there being any value left over to make any payments to equity holders?

3. Did the bankruptcy court err in holding that the proponent of a plan that pays creditors in full but provides no distribution to equity holders who seeks confirmation under 11 U.S.C. § 1129(b) is not required to prove that equity has no value?

4. Did the bankruptcy court abuse its discretion in not allowing the competing chapter 11 plan of Ms. Liu that paid creditors in full with interest, and a \$1 million payment to equity, to proceed in tandem with the plan of Dr. Hu, when, among other things, exclusivity had expired, there was no evidence that a delay would harm creditors or undermine the debtor's operation or its care of patients, and there was no showing that Dr. Hu's plan could be implemented promptly?

5. Did the bankruptcy court commit reversible error, by among other things, finding that the settlement that released Dr. Doody satisfied the criteria of Section 1123(b)?

6. Did the Bankruptcy Court commit reversible error by reaching an erroneous and unfounded conclusion that Ms. Liu's Plan was unconfirmable by, among other things, improperly applying 11 U.S.C. § 1129(c) in concluding that Ms. Liu's plan was inferior, even though it paid all creditors in full and provided for a substantial distribution to the class of equity interests, while Dr. Hu's Plan proposed to pay nothing to equity?

DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL

Entry Date	Docket No.	Document
09/15/2023	24 (8 pgs)	Ombudsman Report for the period of 07/19/2023 through 09/14/2023 Filed by David N. Crapo on behalf of Patient Care Ombudsman. (Crapo, David) (Entered: 09/15/2023)
11/14/2023	33 (5 pgs)	Ombudsman Report for the period of 09/15/2023 through 11/14/2023 Filed by David N. Crapo on behalf of Patient Care Ombudsman. (Crapo, David) (Entered: 11/14/2023)
02/06/2024	44 (3 pgs)	Affidavit <i>Supplemental Certification of Annie Liu in Support of Opposition to Motion to Appoint Chapter 11 Trustee</i> (related document(s)41, 40, 42) Filed by Michael J Kasen on behalf of Global Fertility & Genetics, New York, LLC. (Kasen, Michael) (Entered: 02/06/2024)
02/13/2024	49 (11 pgs; 2 docs)	Declaration <i>/Second Supplemental Declaration of Yihan Hu in Further Support of Movant Dr. Hu Bos Motion for Entry of an Order Directing the Appointment of a Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104(a)</i> (related document(s)37) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Attachments: # 1 Certificate of Service) (Rosenblatt, Andrew) (Entered: 02/13/2024)
02/26/2024	55 (4 pgs)	Ombudsman Report for the period of 11/15/2023 through 02/26/2024 Filed by David N. Crapo on behalf of Patient Care Ombudsman. (Crapo, David) (Entered: 02/26/2024)
03/12/2024	60 (46 pgs)	Affidavit Pursuant to LR 1007-2 <i>AMENDED</i> (related document(s)53, 6) Filed by Michael J Kasen on behalf of Global Fertility & Genetics, New York, LLC. (Kasen, Michael) (Entered: 03/12/2024)
03/18/2024	74 (87 pgs)	Disclosure Statement filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 03/18/2024)
03/18/2024	75 (39 pgs)	Chapter 11 Plan <i>of Reorganization for Global Fertility & Genetics New York, LLC</i> filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 03/18/2024)
03/18/2024	76 (29 pgs)	Motion to Approve <i>/for Entry of an Order (I) Scheduling a Combined Hearing for Approval of Disclosure Statement and Confirmation of Plan, (ii) Approving Deadlines Related Thereto, and (III) Granting Related Relief</i> filed by Andrew Rosenblatt on behalf of Dr. Hu Bo with hearing to be held on 4/9/2024 at 02:00 PM at Videoconference (ZoomGov) (PB). (Rosenblatt, Andrew) (Entered: 03/18/2024)
03/27/2024	84 (38 pgs)	Chapter 11 Plan <i>for Global Fertility & Genetics New York, LLC</i> filed by Brad Jeffrey Axelrod on behalf of Kevin J. Doody, Annie Liu. (Axelrod, Brad) (Entered: 03/27/2024)
03/27/2024	85 (2 pgs)	Letter <i>to the Honorable Philip Bentley</i> (related document(s)84) Filed by Brad Jeffrey Axelrod on behalf of Kevin J. Doody, Annie Liu. (Axelrod, Brad) (Entered: 03/27/2024)
04/04/2024	92 (1 pg)	Appointment of Chapter 11 Trustee <i>/Notice of Approval of Appointment of Trustee</i> (related document(s)91) Filed by Mark Bruh on behalf of United States Trustee. (Bruh, Mark) (Entered: 04/04/2024)

05/01/2024	106 (3 pgs)	Ombudsman Report for the period of 02/27/2024 through 05/01/2024 Filed by David N. Crapo on behalf of Patient Care Ombudsman. (Crapo, David) (Entered: 05/01/2024)
05/17/2024	116 (11 pgs)	Order signed on 5/17/2024 Granting Motion (I) Scheduling a Combined Hearing for Approval of Disclosure Statement and Confirmation of Plan, (II) Approving Deadlines Related Thereto, and (III) Granting Related Relief (Related Doc # 76) . Hearing to be held on 7/9/2024 at 10:00 AM at Courtroom 601 (PB). (Gomez, Jessica) (Entered: 05/17/2024)
06/18/2024	123 (45 pgs)	Chapter 11 Plan / <i>Notice of Filing of Plan Supplement of Dr. Hu Bo, as Plan Proponent, in Support of the Amended Plan of Reorganization of GFG Fertility & Genetics New York, LLC Pursuant to Chapter 11 of the Bankruptcy Code</i> (related document(s)75, 74) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 06/18/2024)
06/19/2024	124 (15 pgs; 2 docs)	Chapter 11 Monthly Operating Report for the Month Ending: 03/31/2024 Filed by Eric Michael Huebscher on behalf of Eric Michael Huebscher. (Attachments: # 1 March 2024 DIP bank statement)(Huebscher, Eric) (Entered: 06/19/2024)
06/24/2024	126 (88 pgs; 2 docs)	Amended Plan / <i>Dr. Hu Bos Amended Chapter 11 Plan of Reorganization for Global Fertility & Genetics New York, LLC</i> (related document(s)75) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Attachments: # 1 Exhibit Redline Original Filed Plan vs. Amended Plan for Filing)(Rosenblatt, Andrew) (Entered: 06/24/2024)
06/26/2024	129 (15 pgs; 2 docs)	Chapter 11 Monthly Operating Report for the Month Ending: 04/30/2024 Filed by Eric Michael Huebscher on behalf of Eric Huebscher. (Attachments: # 1 Bank Statement)(Huebscher, Eric) (Entered: 06/26/2024)
06/26/2024	130 (15 pgs; 2 docs)	Chapter 11 Monthly Operating Report for the Month Ending: 05/31/24 Filed by Eric Michael Huebscher on behalf of Eric Michael Huebscher. (Attachments: # 1 Bank Statement)(Huebscher, Eric) (Entered: 06/26/2024)
07/01/2024	132 (128 pgs)	Objection to Confirmation of Plan <i>and Disclosure Statement of Dr. Hu</i> (related document(s)126, 74) filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/01/2024)
07/03/2024	136 (47 pgs)	Chapter 11 Plan of <i>Reorganization for Global Fertility & Genetics New York, LLC Proposed by Annie Liu, Creditor and Interested Party</i> filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/03/2024)
07/03/2024	138 (3 pgs)	Ombudsman Report for the period of 05/02/2024 through 07/03/2024 Filed by David N. Crapo on behalf of Patient Care Ombudsman. (Crapo, David) (Entered: 07/03/2024)
07/07/2024	140 (92 pgs; 2 docs)	Second Amended Plan / <i>Dr. Hu Bos Second Amended Chapter 11 Plan of Reorganization for Global Fertility & Genetics New York, LLC</i> (related document(s)75, 126) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. with hearing to be held on 7/9/2024 at 10:00 AM at Courtroom 601 (PB) (Attachments: # 1 Redline Amended Plan vs Second Amended Plan)(Rosenblatt, Andrew) (Entered: 07/07/2024)
07/07/2024	141 (46 pgs)	Memorandum of Law of <i>Dr. Hu Bo, as Plan Proponent, (I) In Response to Objection to Confirmation of the Amended Plan of Reorganization, and (II) In Support of</i>

		<i>Confirmation</i> (related document(s)132, 75, 126, 123, 140) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 07/07/2024)
07/07/2024	142 (582 pgs; 11 docs)	Statement / <i>Declaration of Yihan Hu in Support of Plan Confirmation</i> (related document(s)126, 75, 123) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Attachments: # 1 Exhibit A - July 3 Report # 2 Exhibit B - Disclosure Statement with Projections # 3 Exhibit C - Debtor's Plan # 4 Exhibit D - Operating Reports # 5 Exhibit E - Amended Certification of Annie Liu # 6 Exhibit F - Power of Attorney # 7 Exhibit G - Dr Hu Bo Amended Plan # 8 Exhibit H - Notice of Filing of Plan Supplement # 9 Exhibit I - Transcript of March 29 Hearing # 10 Exhibit J - Unfiled Second Amended Plan) (Rosenblatt, Andrew) (Entered: 07/07/2024)
07/08/2024	146 (12 pgs)	Supplemental Objection to Confirmation of Amended Plan of <i>Annie Liu to Dr. Hu Bos Second Amended Chapter 11 Plan of Reorganization for Global Fertility & Genetics New York, LLC</i> (related document(s)140) filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/08/2024)
07/09/2024	147 (88 pgs; 2 docs)	First Amended Plan <i>Chapter 11 Plan Of Reorganization For Global Fertility & Genetics New York, LLC Proposed By Annie Liu, Creditor And Interested Party</i> (related document(s)136) filed by Robert J. Spence on behalf of Annie Liu. (Attachments: # 1 First Amended Plan Redlined Version)(Spence, Robert) (Entered: 07/09/2024)
07/09/2024	148 (7 pgs)	Statement : <i>Omnibus Objections Of Annie Liu To Witness And Exhibit Lists For Confirmation Hearing Scheduled For July 9, 2024 At 10:00 Am (ET)</i> filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/09/2024)
07/09/2024	149 (3 pgs)	Statement of <i>Annie Liu - Preliminary List of Exhibits</i> filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/09/2024)
07/09/2024	156	Transcript regarding Hearing Held on 07/03/24 at 11:00 A.M. RE: Conference. Remote electronic access to the transcript is restricted until 10/7/2024. The transcript may be viewed at the Bankruptcy Court Clerks Office. [Transcription Service Agency: Access Transcripts, LLC.]. (See the Courts Website for contact information for the Transcription Service Agency.). Notice of Intent to Request Redaction Deadline Due By 7/16/2024. Statement of Redaction Request Due By 7/30/2024. Redacted Transcript Submission Due By 8/9/2024. Transcript access will be restricted through 10/7/2024. (Su, Kevin) (Entered: 07/12/2024)
07/10/2024	151 (2 pgs)	Statement / <i>Dr. Hu Bos Supplemental List of Hearing Exhibits</i> filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 07/10/2024)
07/10/2024	152 (4 pgs)	Objection / <i>Dr. Hu Bo Objections to Exhibits Listed in Annie Liu Hearing Exhibit List for the July 9, 2024 Confirmation Hearing</i> (related document(s)149) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 07/10/2024)
07/10/2024	154 (4 pgs)	Statement / <i>Dr. Hu Bo Preliminary List of Hearing Exhibits</i> filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 07/10/2024)
07/15/2024	163 (6 pgs)	Response of <i>Dr. Hu Bo, as Plan Proponent, to Supplemental Objection of Annie Liu to Dr. Hu Bos Second Amended Chapter 11 Plan of Reorganization for Global Fertility & Genetics New York, LLC</i> (related document(s)146) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 07/15/2024)

07/15/2024	165 (4 pgs)	Declaration of Kevin J. Doody (related document(s)140) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 07/15/2024)
07/15/2024	169 (13 pgs)	Statement Notice of Filing of Plan Supplement of Annie Liu, as Plan Proponent, In Support of The First Amended Plan of Reorganization of Global Fertility & Genetics New York, LLC Pursuant to Chapter 11 of the Bankruptcy Code filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/15/2024)
07/15/2024	170 (7 pgs)	Statement : Declaration of Lorin Gu in Support of Confirmation of the First Amended Chapter 11 Plan of Reorganization for Global Fertility & Genetics New York, LLC, Proposed By Annie Liu, Creditor and Interested Party filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/15/2024)
07/15/2024	171 (23 pgs)	Memorandum of Law In Support of Confirmation of First Amended Chapter 11 Plan of Reorganization for Global Fertility & Genetics New York, LLC Proposed By Annie Liu filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/15/2024)
07/16/2024	174 (97 pgs)	Motion for Payment of Administrative Expenses /Application of Dr. Hu Bo, Pursuant to Sections 503(B)(3)(D) and 503(B)(4) of the Bankruptcy Code, for Allowance and Payment of Professional Fees and Expenses and Other Contributions. filed by Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 07/16/2024)
07/16/2024	175 (13 pgs)	Statement [CORRECTED (to replace Exhibit A)] Notice of Filing of Plan Supplement of Annie Liu, as Plan Proponent, In Support of The First Amended Plan of Reorganization of Global Fertility & Genetics New York, LLC Pursuant to Chapter 11 of the Bankruptcy Code filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/16/2024)
07/16/2024	177 (20 pgs)	Amended Statement : Notice of Filing of Amended And Supplemented Plan Supplement of Annie Liu, As Plan Proponent, In Support of The First Amended Plan of Reorganization of Global Fertility & Genetics New York, LLC Pursuant To Chapter 11 of The Bankruptcy Code filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/16/2024)
07/16/2024	178 (3 pgs)	Letter In Preliminary Response to 503(b) Claim, and Letters of 7/16/24 from Counsel for Dr. Hu and Counsel for Dr. Doody (related document(s)173, 176, 174) Filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/16/2024)
07/17/2024	179 (2 pgs)	Statement : Supplemental List of Exhibits In Connection with First Amended Plan of Annie Liu filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/17/2024)
07/24/2024	182 (5 pgs)	Statement : Post-Trial Submission of Annie Liu, Creditor and Party In Interest filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 07/24/2024)
07/24/2024	183 (6 pgs)	Statement /Dr. Hu Bo Post-Confirmation Hearing Submission Providing Citations to the Record in Support of His Second Amended Chapter 11 Plan of Reorganization for Global Fertility & Genetics New York, LLC (related document(s)140) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 07/24/2024)

07/24/2024	184 (6 pgs)	Statement / <i>Chapter 11 Trustee's Post-Confirmation Hearing Submission</i> (related document(s)123, 140) filed by Darren Pascarella on behalf of Eric Michael Huebscher. (Pascarella, Darren) (Entered: 07/24/2024)
07/26/2024	185 (7 pgs)	Statement / <i>Dr. Hu Bo's Post-Confirmation Hearing Submission Providing Evidentiary Support to Find That Ms. Liu's Competing Plan of Reorganization is Not Confirmable</i> (related document(s)136, 147) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 07/26/2024)
08/01/2024	186 (7 pgs)	Statement : <i>Annie Liu's Post-Confirmation Hearing Reply in Response to Dr. Hu Bo's Submission Regarding the Confirmability of Annie Liu's Plan</i> filed by Robert J. Spence on behalf of Annie Liu. (Spence, Robert) (Entered: 08/01/2024)
08/01/2024	187	Transcript regarding Hearing Held on 07/19/24 at 9:58 A.M. RE: Confirmation Hearing. Remote electronic access to the transcript is restricted until 10/30/2024. The transcript may be viewed at the Bankruptcy Court Clerks Office. [Transcription Service Agency: Access Transcripts, LLC.]. (See the Courts Website for contact information for the Transcription Service Agency.). Notice of Intent to Request Redaction Deadline Due By 8/8/2024. Statement of Redaction Request Due By 8/22/2024. Redacted Transcript Submission Due By 9/3/2024. Transcript access will be restricted through 10/30/2024. (Su, Kevin) (Entered: 08/02/2024)
09/05/2024	190 (41 pgs; 3 docs)	Letter to Judge Bentley Regarding Dr. Hu's Proposed Confirmation Order Filed by Robert J. Spence on behalf of Annie Liu. (Attachments: # 1 Attachment - TM Registration # 2 Attachment - Proposed Comments to Dr. Hu's Proposed Confirmation Order)(Spence, Robert) (Entered: 09/05/2024)
09/06/2024	191 (3 pgs)	Letter regarding Plan Confirmation/IP Issue (related document(s)190) Filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 09/06/2024)
09/08/2024	192 (45 pgs)	Memorandum Decision Confirming Dr. Hu Bo's Chapter 11 Plan of Reorganization signed on 9/7/2024 (White, Greg) (Entered: 09/08/2024)
09/10/2024	193 (36 pgs)	Notice of Proposed Order / <i>[Proposed] Findings of Fact, Conclusions of Law, and Order (I) Confirming Dr. Hu's Third Amended Chapter 11 Plan of Reorganization, and (II) Granting Related Relief</i> (related document(s)75, 126, 140) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 09/10/2024)
09/10/2024	194 (44 pgs)	Third Amended Plan / <i>Dr. Hu Bo's Third Amended Chapter 11 Plan of Reorganization for Global Fertility & Genetics New York, LLC</i> (related document(s)75, 126, 140) filed by Andrew Rosenblatt on behalf of Dr. Hu Bo. (Rosenblatt, Andrew) (Entered: 09/10/2024)
09/11/2024	195 (40 pgs; 3 docs)	Letter to Judge Bentley Regarding Annie Liu's Comments to Dr. Hu's Revised Proposed Confirmation Order and Related Matters Filed by Robert J. Spence on behalf of Annie Liu. (Attachments: # 1 Attachment 1 - Revised Proposed Confirmation Order with Redlined Comments (R Spence - Annie Liu) # 2 Attachment 2 - Chase UCC 1)(Spence, Robert) (Entered: 09/11/2024)
09/12/2024	196 (38 pgs; 2 docs)	Letter to Judge Bentley Regarding Annie Liu's Revised Comments to Dr. Hu's Revised Proposed Confirmation Order Filed by Robert J. Spence on behalf of Annie Liu.

		(Attachments: # 1 Attachment - Annie Liu's Revised Comments to Dr. Hu's Revised Proposed Confirmation Order)(Spence, Robert) (Entered: 09/12/2024)
09/17/2024	197 (80 pgs)	Findings of Fact, Conclusions of Law, and Order Confirming Dr. Hu's Third Amended Chapter 11 Plan of Reorganization and Granting Related Relief signed on 9/17/2024 (White, Greg) (Entered: 09/17/2024)
09/23/2024	198 (127 pgs; 3 docs)	Notice of Appeal (related document(s)192, 197) filed by Robert J. Spence on behalf of Annie Liu. (Attachments: # 1 Order Confirming Dr. Hu Bo's Plan # 2 Memorandum Decision Confirming Dr. Hu Bo's Plan)(Spence, Robert) (Entered: 09/23/2024)
06/27/2024	Claim No. 11	Proof of Claim of Annie Liu
Exhibit No. (If Applicable)		Documents Not Filed on the Docket
Liu Exhibit 24		KJD PLLC and GFG Signed Administrative Service Agreement
Liu Exhibit 25		Lorin Gu Resume
Liu Exhibit 26		Prospective Sale Plan Proposal from Silver Birch Group
Liu Exhibit 31		AK20 Holding LLC Proof of \$510,000 on Deposit for Annie Liu's Plan [REDACTED]
Liu Exhibit 32		Screen Shot of Properties Related to Scan of Signed ASA in October 2019
Liu Exhibit 33		Citrin Cooperman Agreement Signed By Dr. Doody
Liu Exhibit 34		Proof of Funds from Recharge Capital – UBS [REDACTED]
		Transcript of hearing held 7/11/2024
		Transcript of hearing held 7/17/2024

Dated: Roslyn, New York
October 6, 2024

Respectfully submitted,

SPENCE LAW OFFICE, P.C.

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